

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

COMES NOW the plaintiff, by and through her attorneys of record, Anderson Law, PLLC, and for cause of action against the above-named defendants, complains and alleges as follows:

I. PARTIES, JURISDICTION, AND VENUE

- 1.1 At all times relevant, plaintiff was a resident of King County, Washington.
- 1.2 At all times relevant, Defendant Lint Van Lines, Inc., was a foreign corporation licensed to do business in the State of Washington and was doing business in King County, Washington.

1 1.3 At all times relevant, Defendants Collier were husband and wife, comprising a
2 marital community under the laws of the State of Washington, and were nonresidents of
3 Washington State. All acts complained of herein were done individually and for the benefit
4 of the marital community.

5 1.4 At all times relevant, Defendant Daniel Collier was an employee/agent of
6 Defendant Lint Van Lines, Inc. All acts complained of herein were done while Defendant
7 Collier was in the course and scope of his employment with Defendant Lint Van Lines, Inc.

8 1.5 All acts complained of herein occurred in King County, Washington.

9 1.6 Jurisdiction and venue are properly found in King County Superior Court.
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11 **II. FACTS**

12 2.1 On or about October 25, 2018, plaintiff and Defendant Daniel Collier were
13 involved in a motor vehicle collision in King County, Washington.

14 2.2 Plaintiff was driving a 2014 Honda Civic in the right lane of Central Avenue
15 North in Kent, Washington. Defendant was driving a semi-truck in the left lane of Central
16 Avenue North. Defendant attempted to turn right from the left lane into a parking lot and
17 collided with the vehicle occupied by plaintiff.

18 **III. DUTY, BREACH, AND PROXIMATE CAUSE**

19 3.1 At the time of the incident complained of herein, defendant owed duties of care
20 in the operation of his motor vehicle. These duties included, but were not limited to, the duty
21 to act reasonably and the duty to follow the rules of the road. These duties were for the safety
22 and benefit of all motor vehicle occupants, including plaintiff.

23 3.2 Defendant breached his duties of care when he negligently caused his vehicle
24 to collide into the vehicle driven by plaintiff.
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3.3 Defendant's negligence proximately caused plaintiff's injuries and damages.

3.4 Defendant Lint Van Lines, Inc. is liable to plaintiff under the doctrines of respondeat superior, agency, and/or vicarious liability.

3.5 At the time of the incident complained of herein, plaintiff acted reasonably and exercised ordinary care. Accordingly, plaintiff was not comparatively “at fault” for the incident or for the injuries and damages that resulted therefrom.

3.6 Defendants are the only “at fault” persons or entities, as that term is defined in RCW 4.22.015, for the motor vehicle collision. There are no non-party persons or entities who are at fault for the collision. Therefore, defendants are 100% liable for plaintiff’s injuries and damages.

IV. DAMAGES

4.1 As a direct and proximate result of defendant's negligence, plaintiff suffered, and will continue to suffer, economic and non-economic damages.

4.2 Plaintiff's injuries and damages are progressive and ongoing.

WHEREFORE, plaintiff prays for judgment to be entered against the defendants herein, and each of them jointly and severally, for such amounts as will reasonably and justly compensate plaintiff for economic and non-economic damages, together with costs, pre-judgment interest, reasonable attorney fees, and for such other and further relief as the Court deems just and proper.

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2 DATED this 17th day of August, 2021.

3 ANDERSON LAW, PLLC

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5 By
6 JOSHUA D. ANDERSON, WSBA #40580
7 THOMAS J. KLUSMEYER, WSBA #12363
8 DAVID GLINDMEYER, WSBA #51286
9 Of Attorneys for Plaintiff
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